



# Risk-Based Demonstration Alternative

NR 445 Technical Advisory Group  
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# TAG Comments

- ◆ Issue: Full BACT review for substances where control will seldom, if ever, be economically feasible
  - ◆ e.g., when BACT review for larger sources has shown control to be economically infeasible
  - ◆ Relatively close (but over) regulatory threshold
- ◆ An option should be available to model individual HAPs against the  $10^{-5}$  risk factor



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# Alternative Risk-Based Demonstration Option

- ◆ BACT/LAER control technology review would not be required if the following demonstration could be made:
  - ◆ Concentration of HAP at property line would not exceed one in a million ( $10^{-6}$ ) risk
    - ◆ potential, non-exempt emissions of any individual HAP
    - ◆ US EPA unit risk factor



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# Rationale for Proposal

- ◆ Preferable to BACT/LAER approach in situations described
  - ◆ Guaranteed  $10^{-6}$  at fence line in many situations is an environmentally better outcome
  - ◆ More effective use of resources
- ◆ Similar structure as with non-carcinogens
  - ◆ Generic threshold levels more conservative than allowed site specific impacts
  - ◆ Compliance with AAC/RfC demonstrated at property line



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# Hierarchy of Compliance Options for Carcinogens

- ◆ Cap non-exempt, potential emissions below threshold
- ◆ Model non-exempt, potential HAPs less than  $10^{-6}$  risk
  - ◆ Possibly in combination with caps
- ◆ Model all sources of potential HAPs less than  $10^{-5}$  risk
  - ◆ Possibly in combination with caps
- ◆ Material elimination or substitution
  - ◆ Possibly in combination with caps & modeling
- ◆ BACT/LAER review